

February 22, 2012

Sen. Andrew Maynard  
Rep. Tony Guerrero  
Transportation Committee  
Legislative Office Building  
300 Capital Avenue  
Hartford, CT 06106

Dear Sen. Maynard and Rep. Guerrero,

As the Director of the Connecticut Association of Independent schools, I represent the interests of 97 nonpublic schools in Connecticut, serving approximately 30,000 students. Our schools take pride in many things; most notably the safety record of our extracurricular student transportation programs.

The students in our schools are transported in state approved buses when traveling from their homes to our schools. These buses are driven by appropriately licensed individuals. We do, however, rely on faculty members to support the transportation needs of after-school programs. This includes teachers who coach sports and drive teams to athletic events once or twice a week as well as a large number of teachers who drive infrequently (a yearbook advisor who occasionally drives the student editors to a local photography studio, a drama teacher who drives students once a year to an annual public speaking competition). All of these drivers comply with the criminal history checks, medical regulations, driving record check, drug testing and other regulations.

We view students in school vans as precious cargo and our safety record provides evidence of that. I have been informed by DMV officials that 7000 Ct residents currently hold an "A" endorsement and that the safety record of the full group is impressive.

The training requirements that will be waived for activity van drivers in the proposed legislation were unnecessarily broad and far-reaching; appropriate for the larger buses and perhaps appropriate for the regular home to school runs, but onerous for uses that are ancillary to school attendance. CAIS schools are certainly amenable to a discussion of uniform pre-service training for activity van drivers and we would actively participate in enforcement (our current practice is to deny re-accreditation to any school that cannot demonstrate full compliance with all federal, state and local laws – and we check). However, the requirements itemized in the original law are excessive and they will place a significant, onerous burden on our schools.

A third party with a vested interest in our safety record is the insurance broker for our 59-school insurance coop. Part of the broker's responsibility is to insure our reputation among insurance carriers in order for us to secure rates that reflect good experience. Below are comments and statistics offered by Mr. Christopher Duble, partner in the Fred C. Church Insurance company:

As the insurance broker and risk management adviser for 59 of the CAIS schools, through the Nutmeg Group consortium, I wanted to weigh in on the question of required training for independent school faculty and staff with "V" licenses with an "A" restriction.

After working with the CAIS schools since 2006, I am convinced that both the outstanding safety record and current training at the schools preclude the need for further, required training. I cannot speak to other entities (e.g. public schools, bus companies, non-education businesses), but for the independent schools in Connecticut, the following should be understood and factored into the regulatory decision:

1. The safety record of these schools has been outstanding over the past five years, and as far as we can tell, for many years before that. An excellent and credible measure of driving safety is the "loss ratio" measured by the automobile insurer of any one school or group of schools. The loss ratio is determined by dividing paid and reserved losses into premium – over time, a group's loss ratio is an accurate measure of that group's claims frequency, claims severity and therefore driving safety record. For the Nutmeg Group (currently 59 of the CAIS schools), against an insurer "breakeven loss ratio" of 55-60%, and an ideal underwriting goal of being below 40%, the loss ratios for the past five years have been 19.3%, 19.2%, 9.7%, 14.8% and 13.2%.
2. The schools already do a significant amount of training. Utica Mutual, as the Nutmeg Group's insurer, and we at Fred C. Church Insurance as the consortium's broker and risk management adviser, have done countless training sessions over the past six years – on campus, with required attendance by all special license drivers, in vehicles as well as in the classroom. In addition to the training we have done or organized through Utica Mutual, the schools do a lot on their own – either online or with consultants and trainers they hire individually.
3. Driver training is not the only risk management tool – in fact our research and claims statistics indicate that driver credentialing is equally important. By ordering MVR's on all affected drivers on a regular basis, requiring physicals, etc., the schools have been able to screen out the bad drivers and not allow them to drive students at all. Training is great, and is done rigorously as noted above, but our belief is that all the training in the world will not make a bad driver into a good driver. Because of the driver credentialing that so many of our schools conduct it's not necessary to implement new and onerous training requirement.

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CAIS

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Thank you for your consideration of our position.

Sincerely,

A handwritten signature in cursive script, appearing to read "Douglas J. Lyons".

Douglas J. Lyons  
Executive Director